

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN) ECF Case
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This document relates to:

Ashton et al. v. al Qaeda Islamic Army, et al., 02-cv-6977 (GBD)(SN) (and member case *Marie Laure Anaya, et al. v. Islamic Republic of Iran*, 1:18-cv-12341 (GBD) (SN)))

**PLAINTIFFS' NOTICE OF MOTION FOR ENTRY OF PARTIAL
FINAL JUDGMENTS FOR SOLATIUUM FOR CERTAIN PLAINTIFFS**

(ANAYA/IRAN II)

PLEASE TAKE NOTICE that, by and through their undersigned counsel and upon the accompanying Memorandum of Law, the Declaration of Joseph Peter Drennan executed on July 21, 2022, together with the Exhibits annexed thereto, and all prior pleadings and proceedings had herein, Plaintiffs Rosemary Puma, John Puma, and William J. Posa as personal representative of the Estate of Grace Posa (collectively, "Movants") respectfully move this Court for an Order awarding them:

- (1) solatium damages for the losses they suffered as siblings of the late Debra Ann DiMartino, in the same amounts previously awarded to siblings of other decedents killed in the terrorist attacks on September 11, 2001; and
- (2) prejudgment interest on the damages awards at the rate of 4.96 percent per annum, compounded annually for the period from September 11, 2001 until the date of the judgment; and
- (3) permission to seek punitive damages, economic damages, or other damages at a later date; and

- (4) permission for all other *Anaya/Iran* Plaintiffs to submit applications for damages awards in later stages, to the extent such awards have not previously been addressed.

Movants' request is made in connection with the judgment on default as to liability that was entered against the Islamic Republic of Iran on October 5, 2021 (ECF 70 in 18-cv-12341 and ECF 7178 in 03-mdl-1570).

Dated: July 21, 2022
White Plains, New York

FLEISCHMAN BONNER & ROCCO LLP

By: /s/ James P. Bonner
James P. Bonner (jbonner@fbrllp.com)
Patrick L. Rocco (procco@fbrllp.com)
Susan M. Davies (sdavies@fbrllp.com)
81 Main Street, Suite 515
White Plains, New York 10601
Telephone: 646-415-1399

Joseph Peter Drennan (admitted *pro hac vice*)
218 North Lee Street, Third Floor
Alexandria, Virginia 22314-2631
Telephone: (703) 519-3773
Telecopier: (703) 997-2591
Mobile: (540) 226-0777
joseph@josephpeterdrennan.com

Patrick M. Donahue (admitted *pro hac vice*)
P. Joseph Donahue (admitted *pro hac vice*)
THE DONAHUE LAW FIRM, LLC
18 West Street
Annapolis, MD 21401
Telephone: (410) 280-2023
pmd@thedonahuelawfirm.com
pjd@thedonahuelawfirm.com

P. York McLane (admitted *pro hac vice*)
LAW OFFICE OF P. YORK MCLANE
14015 Park Dr., Ste. 111
Tomball, Texas 77377
yorkmclane@yahoo.com

Counsel for Plaintiffs